

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
v.	:	CRIMINAL NO. 23-198
JOSEPH LAFORTE	:	
JOSEPH COLE BARLETA	:	
JAMES LAFORTE	:	

GOVERNMENT’S NOTICE OF POTENTIAL WITNESS FOR ORAL ARGUMENT

As the Court is aware, the parties in this case have filed competing motions *in limine* that are scheduled for oral argument on September 11, 2024. On August 25, 2024, the Court ordered the parties to file an offer of proof as to any witness a party believes is necessary to resolve the arguments made in the outstanding motions. ECF No. 200. The government hereby responds to this motion by stating that it does not intend to call any witness in support of its affirmative motions *in limine*. However, the government will have Federal Bureau of Investigations Special Agent John Murray available at the hearing to the extent his testimony becomes necessary to resolve any dispute concerning the base-level reliability of the audio recordings that the government expects it will seek to admit at trial, as set forth in the government’s Motion to Admit Audio and Audio-Video Recordings (ECF No. 184).

Respectfully submitted,

JACQUELINE C. ROMERO
United States Attorney

/s/ Matthew T. Newcomer
MATTHEW T. NEWCOMER
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Notice has been served via electronic filing upon all defense counsel of record for defendants Joseph LaForte, James LaForte, and Joseph Cole Barleta by the Court's ECF notification system.

/s/ Matthew T. Newcomer

MATTHEW T. NEWCOMER

SAMUEL S. DALKE

ERIC D. GILL

Assistant United States Attorneys

Dated: September 6, 2024